

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Johnson, et al. v. The Islamic Republic of Iran</i>	1:18-cv-12344 (GBD)(SN) ECF Case

**PLAINTIFF NAOMI FURMAN’S MOTION FOR ENTRY OF PARTIAL FINAL  
DEFAULT JUDGMENT AGAINST THE ISLAMIC REPUBLIC OF IRAN AS TO  
LIABILITY AND DAMAGES**

PLEASE TAKE NOTICE that upon the accompanying Declaration of David Dickens (“Dickens Declaration”), with exhibits, and the accompanying memorandum of law, Naomi Furman (“Plaintiff” or “Ms. Furman”) respectfully moves this Court for an Order of judgment by default against the Islamic Republic of Iran (“Iran”) under 28 U.S.C. § 1605A(c). Ms. Furman filed suit and served Iran and Iran has failed to appear in the case.

Furthermore, Ms. Furman respectfully moves this Court for an Order awarding (1) solatium and pain and suffering damages for the losses she suffered as the immediate family member (in this instance, a child) of decedent Steven Furman in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001, until the date of the judgment; and (3) permission for Ms. Furman to seek punitive damages, economic damages, or other damages at a later date, and for all other *Johnson* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Respectfully,

Dated: October 25, 2022

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